	Issue	Proponent(s)	Rec'd	SBC Response
	REQUESTS FOR INFORMATION			
1.0	Provide a more detailed description, clarifying the differences between the current hot cut process and the two proposed hot cut batch processes; namely the daily batch and the defined batch.	PUCO Staff	11/10 MW	
1.1	SBC should compare batch cut proposals with existing processes; what the same, what changing, and detail advantages in writing.	IURC Staff	11/6 MW	
1.2	Process flow charts should include all the triggers and timeframes for LNP, 911 unlock, and other required database updates, such as CNAM and directory listings Proposal should address all E 911 database update issues.	PSCW Staff MPSC Staff	11/6 MW 11/6 MW	
1.3	SBC should provide details regarding its current Hot Cut processes (CHC and FDT). Specifically, process flows, LSOR guidelines and sample orders should be made available. Moreover, to the extent performance metrics and flow-through rates are available, such information should be made available to the collaborative for review.	MCI	11/10 MW 11/11 SW	
1.4	SBC must provide considerably more detail concerning its process, including exclusions, inclusions, CLEC-specific batches, OSS modifications, potential ICA amendments, and timelines for each step of the process.	AT&T	11/10 MW 11/11 SW	
1.5	Proposal should include implementation schedules for all needed OSS and process enhancements, and address third party testing of these changes.	IURC Staff	11/6 MW	
1.6	The hot cut timeline requested by AT&T should include SBC actions related to accepting orders or databases changes submitted by CLECs. For example, SBC does not accept 10-digit triggers for LNP orders before the order is placed, but does accept those by the cut-over date. SBC should show where in the process it begins accepting 10-digit triggers, and what event triggers that acceptance (LSR, etc.) SBC should also show whether those dates can be moved, and the consequences. (rationale for moving this trigger: If SBC did not accept / process 10-digit triggers prior to the cutover date, the CLECs could use the ANAC trap and trace process, but any early 10-digit triggers sent during D-2 testing would not trigger premature number ports. Note that there may be better options to solving	PSCW Staff	11/10 MW	

	Issue	Proponent(s)	Rec'd	SBC Response
	this problem than this change, such as specialized traps, etc..) SBC should also show the date / time when the 911 database is unlocked and the event that trigger unlocking the database in its timeline. SBC should show when any other databases (e.g. DA/DL, etc.) are unlocked or modified, as well as the triggering event.			
1.7	Each "proposed" Batch Hot Cut process should be defined clearly, in writing/flow charts, such that all interested parties are able to easily identify and compare/contrast with existing Hot Cut processes, at a minimum, the following: types of orders to be included types of orders to be excluded (e.g. CLEC to CLEC loop?, Line Sharing, etc..) minimum and maximum provisioning intervals minimum and maximum lines per LSR minimum and maximum LSRs which can be sent to SBC per day, per carrier minimum and maximum number lines per CO which will be cut per carrier per day as well as per CO per day (inclusive of the whole industry) LSOR guidelines pertaining to each such proposed Hot Cut process sample LSRs for each order type included in each proposed hot cut process for each such proposed Hot Cut process, identification of OSS changes which will be required and an estimate as to when LSOR guidelines will be updated as well as an estimate as to when changes will be implemented such that carrier to carrier testing can begin identification of the procedures carriers will be required to utilize when accessing the proposed "reservation system" identified as part of the proposed "defined batch cut" process written description of the specific system or human event with triggers an unlock of 911 records with Intrado written explanation of ICA modification process, including proposed amendment and identification of adoption/implementation timelines as well as a discussion as to whether ICA type issues must be resolved prior to the CLECs testing with SBC's OSS personnel applicable prices.	MCI	11/10 MW 11/11 SW	
2.0	Proposal should include historical data on number of hot cuts	IURC Staff	11/6	

	Issue	Proponent(s)	Rec'd	SBC Response
	performed.		MW	
2.1	SBC must clarify the maximum/minimum volumes per day per CLEC for all batches.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
2.2	SBC must explain its assumptions and information surrounding its proposed 100-order limit per day per central office in the Defined Batch process. SBC should provide the assumptions and information surrounding volumes for the defined batch process.	McLeodUSA AT&T	11/10 MW 11/10 MW 11/11 SW	
2.3	Proposal should include current UNE-L and UNE-P volume trends over last year.	IURC Staff	11/6 SW	
2.4	SBC should provide the daily line count threshold that it can handle from a switch translation, collocation and service center perspective for its own UNE-P and retail migrations. Parity must be maintained.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
3.0	SBC should specify the assumptions and exceptions made per batch. (Types of orders, volume limits, etc).	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
4.0	SBC should evaluate whether additional MDF and IDF capacity will be needed by central office. Are there space and or other limitations on the existing MDF or IDF that will cause any problems in the wire center?	AT&T	11/11 SW	
5.0	SBC should clarify the intervals per batch and what the dependencies are per LSR.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
5.1	SBC has not provided the cut timeframe in the defined batch	AT&T	11/10	

	Issue	Proponent(s)	Rec'd	SBC Response
	process. If a CLEC reserves time for 50, 75, or 100 cuts, in what timeframe will SBC conduct these 50, 75, or 100 cuts? AT&T suggests that SBC complete these cuts in the following timeframes: 50 cuts – 2 hours, 75 cuts – 2.5 hours, 100 cuts – 3 hours.		MW 11/11 SW	
6.0	Provide feedback on how SBC's proposed defined batch 13-day interval fits within the Ohio Minimum Telephone Service Standards' (MTSS) requirement that new access lines be provided within at least five business days (O.A.C. 4901:1-5-20). Proposal should be consistent with applicable minimum service standards for installing new service, both retail and wholesale SBC must explain how its proposed 13-day BHC process complies with current State laws requiring new service be provided in less than 13 days.	PUCO Staff PUCO Staff McLeodUSA	11/10 MW 11/6 MW 11/10 MW	
7.0	SBC should outline its "throw back process" and bad Customer Facilities Assignment process for the BHCs to understand customer impact.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
8.0	Develop additional detail on the definitions for the due date reservation tool and the timeline for the defined batch process.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
9.0	SBC has not explained what would happen if trouble is detected on a loop on a particular defined batch cut sheet (e.g., on the fourth loop listed on the cut sheet). AT&T suggests that the SBC frame technician should continue with the "batch" and provide AT&T notice at the next notification interval.	AT&T	11/10 MW 11/11 SW	
10.0	SBC should provide the details on the system modifications being performed for the December CR that will allow CHC orders to flow through	AT&T	11/11 SW	
11.0	SBC has not explained the process for making changes to an order within a batch during the interval from when the batch is defined and a cut sheet is created to the time the hot cut is performed.	AT&T	11/11 SW	

	Issue	Proponent(s)	Rec'd	SBC Response
	SCOPE OF BATCH PROCESS			
12.0	CLEC to CLEC migrations need to be included in the BHC process. The FCC explicitly found that the absence of a CLEC-to-CLEC hot cut migration process is a source of CLEC impairment. *TRO* at ¶ 478 ("Competition in the absence of unbundled local circuit switching requires seamless and timely migration not only to and from the incumbent's facilities, but also to and from the facilities of other competitive carriers.") The applicable FCC rule requires state commission to establish an ILEC "batch hot cut process," which is defined broadly to include "a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier's local circuit switch to another carrier's local circuit switch." 47 C.F.R. 51.319(d)(2)(ii). The FCC specifically did not limit this process to ILEC-to-CLEC migrations.	AT&T	11/10 MW 11/11 SW	
12.1	CLEC to CLEC migrations must also be included in the BHC process. This is especially important if the eventual elimination of UNE-P leads to some fraction of UNE-P carriers opting out of a market. Lack of a CLEC to CLEC process means customers served by a defunct UNE-P carrier would default to the ILEC because of the lack of such a process.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
12.2	Include CLEC to CLEC migrations in the process.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
12.3	Defined process should consider CLEC to CLEC migrations – While not part of the Triennial Review Order, at an industry level the process needs to not only define the transactions that pass from ILEC to CLEC, but be adaptable for CLEC to CLEC transactions as well.	Neustar	11/12 SW	
13.0	SBC should include frame due time ("FDT") cuts in both its daily and defined batches. Reduced coordination is inherent in the frame due time process, and the batch process should reflect those benefits to the extent possible. SBC's claim that the FDT process is sufficient on its own is unsupported by the Triennial Review Order ("TRO"). *See TRO* at ¶ 474 (rejecting the BOC arguments that current FDT processes cure operational impairment associated with hot cuts).	AT&T	11/10 MW 11/11 SW	

	Issue	Proponent(s)	Rec'd	SBC Response
14.0	IDLC loops must be included in the BHC process.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
14.1	Each process should permit provisioning within defined timeframes regardless of whether the customer is served on IDLC.	AT&T	11/11 SW	

14.2	While SBC has allowed for IDLC customers to be included, their inclusion is severely limited. Respondents suggest that: • a process must include a pre-engineering process for loops served by DLC, and • carriers have access to GR-303 technology. Access to a DLC loop at the central office in the absence of access to GR303 essentially gives the carrier a useless loop – the two must be provisioned hand-in-hand.	Sage, Talk America, Z-Tel	11/10 MW	
15.0	Any process must provide for migrating customers with both data and voice (i.e. split or shared lines.).	Sage, Talk America, Z-Tel	11/10 MW	
15.1	SBC should include line-shared and line split loops in its BHC process in order to address CLEC customers that also have CLEC-provided DSL.	AT&T	11/10 MW 11/11 SW	
15.2	Any process must provide for the inclusion of flow through capability for 'as is' line spitting/sharing arrangement in SBC's BHC process. Short of that provision, anything else would effectively shut out data customers in SBC's proposed Batch Hot Cut process. Covad requests inclusion of line splitting and line sharing migrations in the batch cut process that will be approved by the Texas Commission. Indeed, at the last meeting of SBC's 13-state line splitting collaborative, SBC stated that batch cut migration issues should be taken up in the batch cut proceedings, not the collaborative.	COVAD COVAD	11/10 MW 11/11 SW	
15.3	Processes for Line Sharing and Line Splitting	MCI	11/10 MW 11/11 SW	
15.4	Include line splitting and line sharing in the process.	Sage	11/11 SW	
16.0	The "parity" process must include all loop types that SBC historically used for UNE-P. The proposal does not allow for line spitting, line sharing, Broadband, EELs or DS1 customers in the process, thus effectively shutting out all data customers The "parity" process must include all loop types that SBC historically used for UNE-P. This includes IDLC, UDLC, hybrid loops, and remote switching modules.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	

17.0	Migration must allow for a CLEC to obtain an EEL, within statutorily required periods, to allow access to a loop, with switching provided from a distant central office.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
17.1	EEL based connectivity options including: 1. Loop connected to CLEC transport 2. Loop connected to SBC provide transport 3. Loop connected to other carrier transport	MCI	11/10 MW 11/11 SW	
17.2	SBC must facilitate EEL based Hot Cuts even where it has requested – or been granted – a finding of non-impairment regarding transport originating and/or terminating at CO if the requesting CLEC is not collocated in that CO.	MCI	11/10 MW 11/11 SW	
18.0	Any process must provide for a "batch" migration for all Mass Market customers, regardless of the number of DS0 lines included in the MM definition (i.e. *not limited to 3*). SBC has not presented sufficient evidence to support its contention that mass market customers as those with three or less DS0s.	Sage, Talk America, Z-Tel	11/10 MW	
18.1	Strike the "3 or less" line restriction.. It is Sage's understanding from the recent workshop at the Texas Commission that SBC will comply with each state commission's decision on the proper DS-0 cutover point.	Sage	11/11 SW	
19.0	A process needs to be developed for staffing unmanned COs to seamlessly deal with post-cut technical problems in order to reduce customer downtime in such instances.	CoreComm	11/10 MW	
ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (NON-OSS)				
20.0	Intervals should meet the UNE-P standard interval.	McLeodUSA	11/10 MW	
20.1	Set provisioning standards and intervals that are at parity with the existing UNE-P and retail processes. Document such standards and intervals within relevant steps in the process.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	

21.1	The 13-day notice provision in the Defined Batch process is too long. This timeframe should be much closer to the current 5-day timeframe for coordinated hot cuts. SBC must also explain how its proposed 13-day BHC process complies with current State laws requiring new service be provided in less than 13 days. The 13-day notice provision for "defined batches" is far too long. The defined batch timeframe should be much closer to the normal timeframe (5 days) for coordinated hot cuts. 5 day intervals instead of 13 day intervals	McLeodUSA CLEC Coalition AT&T MCI	11/10 MW 11/11 SW 11/10 MW 11/11 SW 11/10 MW 11/11 SW	
22.0	The timeframe for performance of the batch cuts should be based upon the preferences of end use customers, not SBC's traditional business hours.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
23.0	Daily line counts need to be increased for SBC's proposed Daily and Defined Batch processes.	McLeodUSA	11/10 MW	
23.1	The quantity of the batch must be sufficient to allow carriers owning and operating their own switch to take advantage of the economies of scale using that switch. For example, if a carrier has 100,000 customers, SBC must be able to migrate those customers to the switch in sufficient bulk and in sufficient time so that the CLEC does not have unused capacity in the switch.	Sage, Talk America, Z-Tel	11/10 MW	
24.0	The "Daily" and "Defined" batch processes should be expanded to handle multiple central offices per batch (perhaps limited to central offices within the same geographical areas).	CLEC Coaltion	11/11 SW	

25.0	When converting UNE-P to UNE-L, SBC should re-use the existing and working loop in all situations. When converting UNE-P to UNE-L, SBC should be required to re-use the existing and working loop in all situations barring an express request from a CLEC for new facilities	AT&T McLeodUSA	11/10 MW 11/11 SW 11/10 MW 11/11 SW	25.0
26.0	SBC and CLECs should continue to explore the ANAC / trap & trace option. The sidebar discussions after the Ohio meeting seemed promising. However, parties should consider whether implementing this type of approach would mean a significant shift from coordinated cuts to frame due time, and what effect that change might have on resources and on the issue of whether to include FDT in the BHC process and/or pricing scheme.	PSCW Staff	11/10 MW	
26.1	SBC should expand on the "Trap and Trace" concept that CLECs could use to show when cuts are complete.	McLeodUSA	11/10 MW 11/11 SW	
27.0	Dividing the batch cut process into three separate processes could unnecessarily complicate the process. Respondents request one process that provides batch cuts at intervals, standards, and rates that are at parity with SBC's UNE-P and retail migration processes.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
28.0	Develop details on how to rectify problems.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
29.0	Clarify how various parties' orders will be prioritized. Priority should be placed on avoiding, preventing, and remedying outages to the customer.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	

30.0	SBC should clarify how many parallel time slots it will provide to CLECs for all types of hot cuts across each wire center (e.g. Can 1 CLEC be performing a Defined Batch Cut while at the same time a second CLEC is performing a daily batch while a third CLEC is performing a bulk batch in the same wire center? At the same time, can new CLEC customer orders that are placed individually be cut over. If not, what are the rules around what can be performed in parallel and what cannot?	AT&T	11/11 SW	
31.0	Ensure no degradation in the capabilities of the loop after migration, including voice quality, data transmission speeds, and video quality. As competition has allowed companies to bundle local and long distance services, these services are becoming commodities. Companies need to provide additional services, including access to the Internet, to remain competitive. Most customers still access the Internet through dial-up. Therefore, any degradation in data transmission speeds caused by loop migrations places CLECs at a distinct competitive disadvantage.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
32.0	Special consideration must be taken to address all database issues. ALI, CNAM, 911 and LIDB databases must be updated on a real-time basis immediately after conversion.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
32.1	A clear, concise and failsafe method of ensuring that end-use customers that are transferred through the BHC process retain the accuracy of their 9-1-1 service.	LDMI	11/10 MW	
32.2	SBC to unlock the 911 data base at the completion of the physical provisioning step (the port) rather than after the order is closed to billing.	MCI	11/10 MW 11/11 SW	

33.0	Consider how to incorporate third party switching providers in the batch hot cut process. I don't expect a process for UNE-L with LNP to UNE-L with LNP, since most providers do not have a process for doing those even individually, but I would hope to see something which could be used by a UNE-P only provider to convert it's customers to UNE-L with switching it has obtained from a third party. Procedurally, this would be akin to a hot cut of the third party's UNE-P to UNE-L, but the third party switching vendor might need to produce the equivalent of an LOA to show that it was converting lines on behalf of the UNE-P only provider. This is technically much easier than UNE-L to UNE-L. The pricing portion of the BHC dockets should also include this type of conversion. Moving from UNE-P to UNE-L and a third party's switching should not result in the same NRCs as when the third party wins a customer and orders a new UNE-L, and hot cut and LNP. Since third party switching may come from wire centers or locations other than that in which the UNE-P customer is located, the batch hot cut process needs to address cut that connect a UNE-L to transport and/or EELs. (Transport and EELs also need to be included in SBC's processes for other reasons, including providers with limited collocation and potential collocation exhaust.)	PSCW Staff	11/10 MW	
33.1	Proposal should describe how a batch cut would be implemented for a CLEC using wholesale (third party) switch provider.	PSCW Staff	11/6 MW	
33.2	Any process must be provided in a manner that will allow CLECs to use wholesale carriers to provide switching. Included in that consideration is an analysis of what charges would apply and what carrier would be interfacing with SBC.	Sage, Talk America, Z-Tel	11/10 MW	
34.0	PWS site should be enhanced to a) allow status communications in real time, and b) provide circuit engineering details in a comprehensible manner to allow CLECs to verify the accuracy of circuit engineering prior to DD-2.	CoreComm	11/10 MW	
34.1	Assuming that PWS is enabled to allow real time communications, and referring to the step process for CHC located on CLEC ONLINE: Step 1.7, if info is not located on website, the reason for absence of information should be located on the PWS and no call by the CLEC to the LSC should be necessary; Phone calls from CO tech to LOC and from LOC to CLEC specified in Steps 2.1 and 2.2 should be replaced with PWS listings; 1.14, once the orders are confirmed on the PWS, the need for the LOC to send a cut sheet to the CO should be eliminated, and all communications between LOC and CO should be handled via the PWS, so that CLECs may monitor such communications; 1.17,1.18,1.19,3.1, CLEC-initiated phone calls per CO 30 minutes before cut time to the LOC should be replaced with PWS-based correspondence; 3.7, post-cut LOC telephone calls to CLEC should be replaced with PWS based communication; 3.12, 3.6, where LOC notifies CLEC as to "no dialtone/ANI" discrepancies, such instances should replaced with throwback and a jep, and progress with the remainder of the orders should continue.	CoreComm	11/10 MW	

35.0	The batch cut provisioning process should include a pre-engineering 'check' for all loops, particularly those loops served by IDLC. Placing an IDLC configured loop in a 'jeopardy' status causes unnecessary delays and harms the customers. Sage proposes that, instead of using a jeopardy status, SBC institute a pre-engineering 'check' of all hot cut requests prior to executing the hot cut. Further, the pre-engineering check should be included as part of the total provisioning interval outlined in the interconnection agreements and performance measurements.	Sage	11/11 SW	
36.0	SBC should investigate completing the LNP transaction on behalf of the CLEC and notify the CLEC of the order completion including LNP activation via its EDI and LEX interfaces.	AT&T	11/11 SW	
36.1	Investigate acceptance of donor initiated NPAC activation of ports after validation of ANI is complete. - It would take 6-9 months to develop the ability of the NPAC to accommodate this. The NPAC is currently designed to send port notifications to both the donor and recipient carriers. These port notifications can take the place of the manual calling now designed into the process to notify the CLEC that numbers are being ported. Because the ILEC is allowed to activate the port, costs for coordination, including labor on both sides, will be reduced.	Neustar	11/12 SW	
37.0	The SBC Batch Cut processes should allow for OCNs representing different companies to be used (for example: connecting a loop associated with CLEC A's OCN to CLEC B's collocation APOT, assuming CLEC A and CLEC B have the proper agreements for this arrangement). This will facilitate truly functioning wholesale switching arrangements.	CLEC Coalition	11/11 SW	
	ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – GENERAL)			
38.0	Any BHC process must be automated in order to migrate both current UNE-P volumes and, equally important to the ultimate goal of achieving facilities-based competition on strictly a UNE-L platform, to timely process future UNE-L orders in order to minimize or eliminate service disruptions to customers.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
38.1	The manual aspects of SBC's proposed process should be replaced with mechanized, to eliminate the disparate aspects of the process.	AT&T	11/11 SW	

38.2	Greater Mechanization is Possible – Tools and processes allowing for application-to-application mechanization to provide integration with CLEC order management systems. GUIs require data to be manually input as well as duplicate entries of data. Each step involving manual intervention increases the likelihood of errors. To further reduce errors introduced by manual intervention, steps that involve phone calls between parties can be designed to have a mechanized means of exchanging the same information. Process automation allowing for the reduction of resource requirements will allow for greater volumes and lower costs. Manual intervention is required for the following steps in the proposed process: - Reserve date and obtain project ID - Complete and submit cut sheet - CLEC call to ILEC Local Field Office to initiate cut - ILEC call to CLEC that cut is complete (possibly multiple calls if more than 20 lines) - CLEC communication to ILEC LOC regarding CFA dial tone/ANI problems	Neustar	11/12 SW	
38.3	Inclusion of the ancillary transactions in the batch hot cut process – To ensure success of the porting process transactions such as; - LSR Preorder (e.g. Appointment scheduling, CFA validation) - NPAC SV Creates/Activates - E-911/LIDB maintenance Process automation that includes these transactions will be more useful to the industry as a whole and ensure a complete migration.	Neustar	11/12 SW	
38.4	The BHC process needs to provide system flow-through end to end, prior to going live with the BHC process.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	

38.5	Any BHC process must be automated, seamless, and be 100% accurate without loss of service to customers. It must be scalable and adaptable to the needs and requirements of varying facilities-based CLECs, alternative wholesale providers, and intermodal carriers. Any batch cut process must be scalable and adaptable to the needs and requirements of varying facilities-based CLECs, alternative wholesale providers, and intermodal carriers. Indeed, many smaller UNE-P CLECs would have to purchase and deploy facilities, if no impairment is found in a market area. Therefore, the batch cut process should allow these CLECs sufficient time to deploy the facilities, as appropriate.	Sage, Talk America, Z-TelA Sage	11/10 MW 11/11 SW	
39.0	The order flow through verification and due date reservation tools should apply to all of SBC's proposed options, not just the defined batch and bulk project proposals.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
40.0	Any pre-order, order, or post-order functionality to support any BHC process must be developed in both EDI and GUI. SBC has only promised to build the functionality in their GUI, and has not agreed to develop the same functionality in EDI (i.e.; Reservation tool, etc.). CLECs should not be forced to go outside of its primary OSS interface in order to utilize this BHC process.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
41.0	Establish parity OSS for the batch cut processes.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
42.0	Develop clear and accurate loop and other OSS data that can be updated on a 'real-time' basis.	Sage, Talk America, Z-Tel Sage	11/10 MW 11/11 SW	
42.1	The circuit ID information relied upon by the ILEC and the CLEC should be accurate in the loop qualification data base.	Sage, Talk America, Z-Tel	11/10 MW	
43.0	Mechanisms whereby the "pending order" issue can be resolved. MCI recommends that a set of exceptions to the current pending order rules be developed so that customers in the process of migrating to a UNE-L carrier could migrated to another carrier of their choice prior to the UNE-L order completing.	MCI	11/10 MW 11/11	
ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – PREORDER)				

44.0	VERIGATE should be enhanced to contain outside plant records so that IDLC and other facility information is made available to CLECs as a pre-order validation tool. This functionality will also reduce the need for FMOD.	CoreComm	11/10 MW	
45.0	SBC should integrate PWS (Web Based order and status system for hot cuts) into its existing Datagate and EDI interfaces allowing CLECs to either use the web based system or Datagate for pre-order and EDI for ordering.	AT&T	11/11 SW	
46.0	SBC pre-order systems should allow CLECs to reserve CHC slots for new customer orders such that a CLEC can provide assurance to its customers of the cut over times at parity with the times provided via retail to UNE-P conversions.	AT&T	11/11 SW	
ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – ORDER)				
47.0	Improvements to Reservation Tool should be made available all hot cuts, daily, batch or otherwise.	CoreComm	11/10 MW	
47.1	Due date reservations for all Hot Processes, including the existing processes for single and multiple lines.	MCI	11/10 MW 11/11 SW	
47.2	Reservation tool applied to Frame Due Time cutovers as well as real time, mechanized status reports, presumably through the upgraded PWS tool.	MCI	11/10 MW 11/11 SW	
47.3	SBC should consider making available the real-time reservation tool for the daily batch process.	AT&T	11/10 MW 11/11 SW	

ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – PROVISIONING)				
48.0	An option whereby CLECs can elect to have SBC's OSS automatically effectuate the completion of the number porting process (activate the customers numbers now residing on the CLECs switch within the database), thus eliminating the two step process currently in place.	MCI	11/10 MW 11/11 MW	
49.0	SBC needs to provide "real time" return of their 865 EDI completions, prior to moving forward with this process. Currently SBC sends completions in a nightly "batch," thereby preventing us from capturing the actual completion time of the cut from a systems perspective.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – MAINTENANCE/REPAIR)				
ISSUES CONCERNING PARTICULARS OF BATCH PROCESS (OSS – BILLING)				
50.0	Process should provide information on Billing and SBC notifiers to CLECs.	IURC Staff	11/6 SW	
ISSUES CONCERNING VALIDATION/TESTING/PERFORMANCE				
51.0	SBC should test the defined batch process on its retail customers. SBC should volume test the defined batch process on its retail customers.	AT&T	11/10 MW 11/11 SW	
52.0	SBC must "load test" their systems to verify whether it can handle the large number of FOCs, SOCs, and billing activities. SBC must also ensure that associated vendors (numbering administrator, E911 administrator, etc.) can handle any increased loads.	AT&T	11/10 MW 11/11 SW	
52.1	Testing. SBC should be required to test any proposed BHC process before a Commission makes a finding on whether CLECs are impaired in switching mass-market customers. SBC must also ensure that associated vendors (numbering administrator, E911 administrator, etc.) can handle any increased loads.	McLeodUSA CLEC Coalition	11/10 MW 11/11 SW	
52.2	SBC should propose an appropriate testing process other than an "internal test bed" option.	MCI	11/11 SW	

53.0	The LNP process must be thoroughly tested to ensure that any issues arising from the "scalability" of the process do not cause service failure.	LDMI	11/10 MW	
54.0	Identified performance metrics with financial incentives.	MCI	11/10 MW 11/11 SW	
54.1	Performance measures should be established to provide a level of performance consistent with that currently available for UNE-P.	AT&T	11/11 SW	
54.2	Enforce provisioning standards and intervals through the appropriate performance measurement and remedy plan.	Sage, Talk America, Z-Tel	11/10 MW	
55.0	Link between performance metrics and the immediate, dynamic reversal of any non-impairment finding where such finding may exist. For any time period during which Hot Cut performance is substandard, UNE-P would be available at TELRIC rates and such lines activated in these periods would be grandfathered to UNE-P or, at the CLEC's option, cut to CLEC's switch free of charge when Hot Cut performance is back within compliance. This should include commercial testing.	MCI	11/10 MW 11/11 SW	
PRICING				
56.0	Pricing information should be included with final proposal. What is the hot cut component of the existing NRCs?	PSCW Staff PUCO Staff	11/6 SW 11/6 SW	
56.1	The FCC stressed one of the key factors for concluding that impairment exists in switching mass market customers involves the cost of the non-recurring charges (NRCs) charged to CLECs. SBC's Midwest proposal must specifically quantify all proposed NRCs involved in the BHC process.	McLeodUSA	11/10 MW 11/11 SW	
56.2	Need appropriate rates.	MCI	11/10 MW 11/11 SW	

56.3	Consideration should be given to a competitively neutral cost recovery mechanism for all costs.	MCI	11/10 MW 11/11 SW	
56.4	Cost and pricing details need to be fully examined, • The cost of implementing and provisioning the batch must be spread across all customers (similar to the LNP charge), and not to the carriers that must migrate their customers. In identifying these costs, the CLEC additional costs must also be identified and recovered through the same process that the ILEC additional costs are recovered. • In determining rates, equal weight should be given to the incremental costs incurred by CLECs.	Sage, Talk America, Z-Tel	11/10 MW	
56.5	The batch cut rates must provide CLECs with a meaningful opportunity to compete and any proceeding to determine such rates should give equal weight to the incremental costs incurred by CLECs. SBC's proposed batch cut costs are costs that would apply to CLECs that were not foreseen by CLECs when they developed their business plans. Therefore, Sage proposes consideration of a rate applicable to all end users, similar to the LNP charge. At the very least, the incremental cost to the ILEC and CLEC must be reimbursed.	Sage	11/11 SW	
OTHER				
57.0	Identify the specific wire centers located within the MSAs that SBC identified in its October 23, 2003 filing as *not* being subject to the batch cut process. Proposal should clearly defined in which geographic markets the new batch cut process will be available.	PUCO Staff PUCO Staff	11/10 MW 11/6 SW	
57.1	Referring to SBC Ohio's October 17 Petition, Attachment B as filed in Case No. 03-2040-TP-COI, what is the access area (B, C, or D) for each wire center?	Ohio Consumers' Counsel	11/10 MW	
58.0	MCI remains hopeful that procedures and practices eventually emanating from the SBC Batch Hot Cut process will help to facilitate the transition of a significant portion of its current, or embedded, UNE-P-based mass market customers to services provided over unbundled loop facilities purchased from SBC and switching facilities owned and/or controlled by MCI itself. It is MCI's expectation that any processes designed facilitate such a migration will be efficient, economical and, most importantly, non customer impacting. MCI does not believe, however, that the mere *identification* – as distinguished from the designing, testing, implementation and on-going performance – of a Batch Hot Cut process is sufficient to address questions of impairment.	MCI	11/10 MW 11/11 SW	

59.0	MCI encourages SBC, State Public Service Commission Staffs and all other Parties involved in this on-going collaborative to recognize that the establishment or modification of a Batch Hot Cut processes must be considered along with all other affected systems, procedures and practices in order to verify that each such system, procedure and practice will effectively perform their designed functions simultaneously. Also, a Batch Hot Cut process which has been discussed in these collaboratives does not address other areas of impairment relating to other types of hot cuts - such as CLEC to CLEC migrations, CLEC to ILEC migrations which will occur after the embedded base of a given has been transitioned to UNE-L in a given geographic market or the migration of customers who have CLEC data services from UNE-P line splitting to UNE-L line splitting.	MCI	11/10 MW 11/11 SW	
60.0	MCI encourages SBC, State Public Service Commission Staffs and all other Parties involved in this ongoing collaborative to remain focused on the long-term objectives involved with the establishment of an efficient Hot Cut process and to consider not only the short-term, manual modifications, but the longer term possibilities including, for example, the wider implementation of GR303 capable Digital Loop Carrier systems which would allow for the unbundling of DLC based loops without migration to "other facilities," which often times contributes to additional manual process, delay and error. The use of automated, or robotic, frames should also be contemplated as a longer term solution, particularly in unmanned COs similar to those in which such technologies have already been tested, proven and are currently operational.	MCI	11/10 MW 11/11 SW	
61.0	Neither the SBC proposed "Daily Batch" or "Defined Batch" processes resolve the impairment problems that exist for customer acquisition. The "Daily Batch" process is the same Hot Cut process that exists today (with its inherent flaws regarding timeliness, cost and scalability). The "Defined Batch" process includes a 13 business day interval (almost three calendar weeks), which makes the process unsuitable for customer acquisition (mass market customers will expect service much faster and CLECs will lose customers if the interval is so long). SBC should consider revising the Daily Batch process to facilitate the use of one LSR from the CLEC that allows many end users to be addressed and provisioned together. SBC should also make the Defined Batch process more timely (using current UNE-P intervals rather than the 13 day interval).	CLEC Coalition	11/11 SW	
62.0	The drafters and regulators of the batch cut process should place a priority on avoiding, preventing, and remedying outages to the customer. As paragraphs 465-467 of the TRO require, migrations for mass-market customers must be orderly, seamless, and trouble free. "Competition is meant to benefit consumers, and not create obstacles for them." (TRO, para. 467.) Also, in today's environment, it is important for public safety and the safety of customers for the customers to have continuous access to the telephone system.	Sage	11/11 SW	

63.0	A complete batch hot-cut process should include automation not only of the CLEC-ILEC interaction relating to the scheduling and coordination of the hot cut, but also to all the ancillary transactions that need to be managed. One way to ensure that this process goes smoothly is through an industry-standard clearinghouse. Such a clearinghouse would: • Manage the exchange of information amongst all the industry's trading partners using established and proven technology that includes process automation, fallout management, automated local service request gateways, adapters to third party service bureaus (such as E911, LIDB and CNAM databases) and the Number Portability Administration Center (NPAC). • Allow CLECs and ILECs to interact with a single clearinghouse instead of each interacting with all the others. • Provide CLECs, ILECs, and regulators with the information and reports necessary to manage batch hot cuts and ensure the process is working smoothly.	NeuStar	11/12 SW	